

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

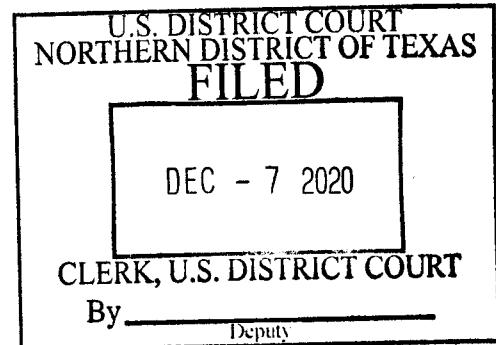
UNITED STATES OF AMERICA

v.

DERRICK LLOYD FANNIN	(01)
ALEJANDRA PATRICIA FANNIN	(02)
ADAM MICHAEL KILGORE	(03)
JONATHAN RODRIGUEZ	(04)
CHELSEA ANN PINEIRO	(05)
YVETTE JASMINE GONZALEZ	(06)
NORMA CASIO	(07)
ROSHUA MARQUISTON WHITE	(08)
MICHAEL TODD JOHNSON	(09)
NATHAN LEE COOK	(10)
ENRIQUE ALEJANDRO FAZ	(11)
LUIS IRVING MONTANEZ	(12)
FRANCIE CATALINA ETHERIDGE	(13)
NATASHI MARIE MILTON	(14)
RODOLFO IBARRA	(15)
KENDRIC DESHON THOMPSON	(16)
ROBERT HARRIS JR	(17)
AUDREY ANISSA WILFORD	(18)
OSCAR GUILLERMO CONTRERAS	(19)
RUBEN NEGRETE III	(20)
BRETT TRAVIS CICHON	(21)
MICHAEL ANTHONY O'CONNELL	(22)

Case No.

4-20CR-339-Y



INFORMATION

The United States Attorney Charges:

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before December 2019, and continuing until in and around October 2020, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Jonathan Rodriguez**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), namely to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)).

Count Two

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before December 2019, and continuing until in and around October 2020, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Derrick Lloyd Fannin, Adam Michael Kilgore, Michael Todd Johnson, Nathan Lee Cook, Enrique Alejandro Faz, Rodolfo Ibarra, Robert Harris, Jr., and Oscar Guillermo Contreras**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

Count Three

**Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)**

December 2019, and continuing until in and around October 2020, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Alejandra Patricia Fannin, Chelsea Ann Pineiro, Yvette Jasmine Gonzalez, Norma Casio, Roshua Marquiston White, Francie Catalina Etheridge, Natashi Marie Milton, Kendric Deshon Thompson, Audrey Anissa Wilford, Michael Anthony O'Connell, Ruben Negrete III, and Brett Travis Cichon**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C §§ 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(C)).

Count Four

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before December 2019, and continuing until in and around October 2020, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Luis Irving Montanez**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C §§ 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of Cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(C)).

Forfeiture Notice

21 U.S.C. § 853, 21 U.S.C. § 881(a), 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)

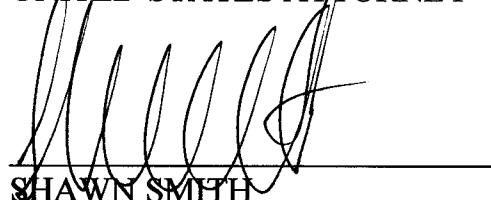
Pursuant to 21 U.S.C. § 853(a), upon conviction of any of Counts One through Four, the defendants shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of Counts One through Four, and any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of Counts One through Four.

Pursuant to 21 U.S.C. § 853(p), if any forfeitable property as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States intends to seek forfeiture of any other property of the defendant up to the value of any forfeitable property.

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